

BART H. WILLIAMS (State Bar No. 134009)
bart.williams@mto.com
MANUEL F. CACHAN (State Bar No. 216987)
manuel.cachan@mto.com
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue
Thirty-Fifth Floor
Los Angeles, California 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

DAVID H. FRY (State Bar No. 189276)
david.fry@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street
Twenty-Seventh Floor
San Francisco, California 94105-2907
Telephone: (415) 512-4000
Facsimile: (415) 512-4077

Attorneys for Defendants, WELLS FARGO &
COMPANY and WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHAHRIAR JABBARI, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

WELLS FARGO & COMPANY and WELLS
FARGO BANK, N.A.,

Defendants.

Case No. 15-CV-02159 VC

**STIPULATION EXTENDING TIME TO
RESPOND TO THE COMPLAINT**

Judge: Hon. Vince Chhabria
Ctrm.: 4
Action Filed: May 13, 2015

1 This Stipulation is made by and between Plaintiff Shahriar Jabbari and Defendants Wells
2 Fargo Bank, N.A. and Wells Fargo & Company, as follows:

3 WHEREAS, Defendants were served with the summons and complaint in this action on or
4 about May 19, 2015;

5 WHEREAS, Defendants have not yet answered or otherwise responded to the complaint;

6 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1), Defendants had
7 twenty-one days from the date of service of the complaint to answer or otherwise respond to the
8 complaint (*i.e.*, by June 9, 2015);

9 WHEREAS, Plaintiff has agreed to extend the deadline for Defendants to answer or
10 otherwise respond from June 9, 2015 to July 9, 2015;

11 WHEREAS, counsel for Plaintiff and Counsel for Defendants have agreed that the
12 opposition to any motion filed by Defendants in response to the complaint will be filed not later
13 than September 18, 2015 and any reply in support of such a motion will be filed not later than
14 October 26, 2015.

15 NOW, THEREFORE, Plaintiff and Defendants, through their respective counsel of record,
16 hereby stipulate that:

17 (i) Defendants shall have through and including July 9, 2015 to answer or otherwise
18 respond to the Complaint;

19 (ii) Plaintiff shall have through and including September 18, 2015 to file his brief in
20 opposition to any motion Defendants may file in response to the Complaint; and

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 (iii) Defendants shall have through and including October 26, 2015 to file any reply brief
2 in support of any motion filed in response to the Complaint.

3
4 DATED: June 12, 2015

MUNGER, TOLLES & OLSON LLP

5
6 By: /s/ David H. Fry

7 David H. Fry

8 Attorneys for Defendants,
9 Wells Fargo Bank, N.A. and Wells Fargo &
10 Company

11 DATED: June 12, 2015

KELLER ROHRBACK, L.L.P.

12
13 By: /s/ Matthew J. Preusch

14 Matthew J. Preusch

15 Attorneys for Plaintiff,
16 Shahriar Jabbari